

## V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

### V. NUTRITION SERVICES AND ADMINISTRATION (NSA) EXPENDITURES

(Please indicate) **State Agency: Wisconsin**

for **FY 2022**

NSA expenditures involve the process of allocating, documenting and monitoring the distribution of administrative funds to local agencies, including the monitoring of nutrition education costs, and State and local agency direct/indirect costs.

**A. Funds Allocation-246.4(a)(13):** describe the policies and procedures used to allocate administrative funds to local agencies, including start-up funds, and conversion of food funds to NSA funds.

**B. Local Agency Budgets/Expenditure Plans-246.4(a)(2):** describe the policies and procedures for preparing and submitting local agency budgets and expenditure plans and the services that are entirely supported by WIC Program funds.

**C. State and Local Agency Access to Funds-246.4(a)(13):** describe the procedures and method(s) of distribution/ reimbursement of NSA funds to local agencies.

**D. Reporting and Reviewing of State and Local Agency Expenditures-246.4(a)(11)(iv); (12); and (13):** describe the policies and procedures used to report, monitor, and review State and local agencies' expenditures, including the documentation of staff time, local agency report forms, on-site reviews of local agencies' NSA expenditures, and in-kind contributions.

**E. Nutrition Education Costs-246.4(a)(9)and 246.14(c)(1):** describe the plans and procedures used to meet the nutrition education expenditure requirements, including monitoring activities, local agency reports, and assurances that the special nutrition education needs of migrant farmworkers and their families, Indians, and homeless persons are met.

**F. Indirect Costs-246.4(a)(12):** describe the policies and procedures used to document and monitor indirect cost rates and services at the State and local level.

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### A. Funds Allocation

#### 1. Allocation Process

- a. The State agency has established and provided written procedures to local agencies describing the process for allocation of NSA funds among local agencies.

☒ Yes                      ☐ No                      ☐ Not applicable, State agency does not have separate local agencies. (Proceed to A. 2. *Conversion of Food Funds to NSA Funds*)

- b. Local agencies were involved in developing these procedures via:

☐ Task force/committee of selected local agencies  
☐ Comment on proposals made available to all local agencies  
☒ Other (describe): State office task force convened to determine

- c. The State agency allocates NSA funds to local agencies through the use of:

☐ A negotiated budget                      ☐ Flat cost per participant Statewide  
☒ Formula (variable)                      ☐ Other method (describe):

- d. The allocation procedure takes the following factors into account (check all that apply):

☐ Staffing needs  
☒ Number of participants  
☐ Population density  
☐ Cost-containment initiatives  
☐ Availability of administrative support from other sources  
☒ Other (specify): geographic area if serving multiple counties, satellite clinics, interpreter costs

- e. The State agency methodology for funds allocations to local agencies includes a mechanism for reallocation.

☒ Yes  
    ☐ Monthly    ☐ Quarterly    ☒ Semiannually    ☒ Other (specify): as needed if significant changes  
☐ No

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

#### 2. Conversion of Food Funds to NSA Funds

- a. The State agency converts food funds to NSA funds:

☐ Based on a plan submitted to FNS to reduce average food costs per participant and to increase participation above the FNS-projected level for the State agency.  
☒ The State agency achieves, through acceptable measures, increases in participation in excess of the FNS-project level for the State agency.  
☐ Describe measures used to increase participation:

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

3. The State's Fiscal Year runs from 07/01/2021 to 06/30/2022

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### B. Local Agency Budgets/Expenditures Plans

#### 1. Local Agency Budgets/Expenditure Plans

☐ Not applicable, State agency does not have separate local agencies.

*(Proceed to C. State and Local Agency Access to Funds.)*

#### a. The State agency requires its local agencies to prepare and submit administrative budgets.

☒ Yes ☐ No

**If yes, the State agency requires that local agency budgets include the same cost categories as those used for State-level budget preparation.**

☐ Yes ☒ No

#### b. Local agencies' budgets are broken out by (check all that apply):

☒ Line items

☐ Accounting

☐ ADP services

☒ Breastfeeding aids

☒ Capital expenditures

☒ Clinic/lab services

☐ Communications

☒ Employee salaries

☒ Employee fringe benefits

☒ Lease or rental of space

☒ Functions

☒ General administration/  
program management

☐ Food delivery

☐ Certification

☒ Nutrition education

☒ Maintenance and repair

☒ Materials and supplies

☒ Memberships, subscriptions, and professional activities

☒ Printing and reproduction

☒ Training and education

☐ Transportation

☒ Travel

☒ Other (specify): indirect costs, consultants/contractual, special projects

☒ Breastfeeding promotion/support (e.g., breastfeeding aids

☒ Client services

☐ Other (specify):

#### c. The State agency has an established formal process for local agencies to follow when requesting amendments or modifications to their budgets.

☒ Yes ☐ No

#### d. In order to prepare the federally required WIC administrative budget, the State agency:

☐ Uses local agency budgets or prior year expenditures

☐ Reports under an ongoing system to collect this data

☒ Extracts or consolidates data reported under other State or local agency systems to group costs under the federal line items and functions

☐ Other (describe):

(State WIC administrative budgets are not submitted to FNS, but are used by State agencies as a management tool and may be reviewed by FNS.)

**ADDITIONAL DETAIL: SA/LA Spending Plan Appendix and/or Procedure Manual (citation): Appendix V.B.1 Budget Forms, Policy 11.2**

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### C. State and Local Agency Access to Funds

**1. The State Agency manages its NSA Grant on a/an:**

- ☐ Cash basis      ☒ Accrual basis  
☐ Other (specify):

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

**2. Reimbursement/Provision of Funds to Local Agencies**

**a. The State agency provides local agencies with funds in advance.**

- ☐ Yes (state conditions):  
☒ No  
☐ Not Applicable (Proceed to next section.)

**If yes, advances must be reconciled to incoming claims. Local agency claims are submitted:**

- ☐ Monthly      ☐ Quarterly

**b. In order to qualify for payment, an expenditure must be (check all that apply):**

- ☐ At or below the level of its approved budget line item  
☒ Supported by appropriate documentation (e.g., check or receipt)  
☒ A reasonable and necessary expense for WIC  
☐ Other (specify):

**c. If an expenditure exceeds the budget provided for that particular line item, the State agency requires the local agency to (check all that apply):**

- ☐ Submit a supplemental request  
☐ Provide a justification for exceeding the budget line item  
☒ Make an offsetting adjustment to another line item in its budget  
☐ Request approval of a budget modification  
☐ Other (explain):

**d. Local agencies receive payment via:**

- ☒ Electronic funds transfer      ☐ State treasury check/warrant  
☐ Other (specify):

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

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### D. Reporting and Reviewing of State and Local Agency Expenditures

#### 1. Documentation of Staff Time

- a. How does the State agency determine the percentage of staff time devoted to WIC tasks to document allowable staff costs under the WIC Program (check all that apply):

At SA    At LA

- |                                     |                                     |                               |
|-------------------------------------|-------------------------------------|-------------------------------|
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | 100 percent reporting         |
| <input type="checkbox"/>            | <input type="checkbox"/>            | Random moment sampling        |
| <input type="checkbox"/>            | <input type="checkbox"/>            | Periodic time studies:        |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 1 week/month                  |
| <input type="checkbox"/>            | <input type="checkbox"/>            | 1 month/quarter               |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Other (specify): 1 month/year |

- b. The State agency last evaluated its time documentation protocol on (specify date). 10/01/2004.  
If available, please attach a copy of the protocol to this section or cite Procedure Manual reference.

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

**Appendix V.D.1. Time Study**

#### 2. Please indicate below the services that are entirely supported by WIC funds:

- ☒ Anthropometric measurements
- ☒ Nutrition counseling/education
- ☒ Breastfeeding promotion/support
- ☒ Immunization status assessments
- ☒ Referrals to health and/or social services
- ☒ Hematological assessments
- ☒ Other (specify): certification, food benefit issuance, vendor management, daily program management

**ADDITIONAL DETAIL: SA/LA Spending Plan Appendix and/or Procedure Manual (citation):**

#### 3. Local Agency Report Forms

- a. The State agency specifies standard forms and/or procedures for local agencies to use in reporting monthly local-level expenditures.

☒ Yes            ☐ No            ☐ Not Applicable (Proceed to next section)

- b. Local agencies' budgets are broken out by (check all that apply):

☐ Not applicable

☒ Line items

- |  |   |
|--|---|
| <input type="checkbox"/> Accounting                      | <input checked="" type="checkbox"/> Maintenance and repair                                  |
| <input type="checkbox"/> ADP services                    | <input checked="" type="checkbox"/> Materials and supplies                                  |
| <input checked="" type="checkbox"/> Breastfeeding aids   | <input checked="" type="checkbox"/> Memberships, subscriptions, and professional activities |
| <input checked="" type="checkbox"/> Capital expenditures | <input checked="" type="checkbox"/> Printing and reproduction                               |
| <input checked="" type="checkbox"/> Clinic/lab services  | <input checked="" type="checkbox"/> Training and education                                  |
| <input type="checkbox"/> Communications                  | <input type="checkbox"/> Transportation   |

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- ☒ Employee salaries
- ☒ Employee fringe benefits
- ☒ Lease or rental of space
- ☒ Functions
  - ☒ General administration/Program management
  - ☐ Food Delivery
  - ☐ Certification
  - ☒ Nutrition education
  - ☐ Other (specify):
- ☒ Travel
- ☒ Other (specify): indirect costs, consultants/contractual, special projects
- ☒ Breastfeeding promotion/support (e.g., breastfeeding aids)
- ☒ Client services
- ☐ Other (specify):

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

### Appendix V.D.3. CARS Report Form

#### 4. On-Site Review of Local Agencies' Administrative Expenditures

**a. The State agency conducts on-site reviews of local agency administrative expenditures:**

- ☐ Annually
- ☒ Every two years
- ☐ Every three years
- ☐ Other (specify):

**The review is conducted by:**

- ☒ WIC State agency staff
- ☐ State Department of Health fiscal or audit staff
- ☐ CPA or audit firm
- ☐ Other (specify):

**b. The State agency utilizes a standard format/guide to review local agencies' NSA expenditures.**

- ☒ Yes
- ☐ No

**If yes, the standard review guide includes the following procedures (check all that apply):**

- ☒ Verification of at least one monthly billing/claim/expenditure report against source
- ☐ Documents
- ☒ Tracking written approval of procurements
- ☒ Requesting records of ordering, receipt, billing, and payment
- ☒ Determination that costs were necessary, reasonable and appropriate
- ☒ Determination that costs were properly allocated among WIC and other programs
- ☒ Determination that personnel costs charged to WIC were appropriate
- ☒ Determination that local agencies' indirect costs were appropriately charged
- ☐ Other (specify):

**c. If available, please attach a copy of the State agency's NSA expenditure review guide.**

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- d. **The State agency notifies local agencies of findings and establishes claims for unallowable costs, as appropriate.**

☒ Yes      ☐ No

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

See Appendix X.A.2.d. Wisconsin WIC Fiscal Monitoring Tool. Regarding audits: For those WIC agencies that expend \$750,000 or more in federal awards for the audit year, the WIC provider agency is required to have an annual compliance and financial audit performed in accordance with Uniform Guidance (2 CFR Part 200), the Uniform Guidance's Compliance Supplement, the Wisconsin's State Single Audit Guidelines (SSAG), and the Wisconsin DHS Audit Guidance appendix to the SSAG. Link: <https://www.dhs.wisconsin.gov/business/audit-federal.htm>

5. **The State agency requires local agencies to document the sources and values of in-kind contributions.**

☐ Yes      ☒ No

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

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### E. Nutrition Education Costs

1. The State agency documents that it meets its nutrition education and breastfeeding promotion expenditure requirements per 7 CFR 246.14(c)(1) via:

☐ Activity reports      ☒ Time studies      ☐ Itemizing expenditures

☐ Other (specify):

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

Appendix V.D.1. Time Studies; Policy 11.2

2. The State agency monitors expenditures for the following activities related to breastfeeding promotion and support at the State and/or local level (check all that apply):

	At SA	At LA
Breastfeeding promotion coordinator's salary	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Written educational materials	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Participant education/counseling	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Staff training	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breastfeeding promotion activities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Direct support costs	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Breastfeeding aids and equipment (e.g., breast pumps purchased with NSA funds)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>

(If other, specify):

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

Policies 11.1, 11.2

3. In the event that the State agency uses funds from other sources in meeting minimum expenditure requirements for nutrition education (NE) and breastfeeding promotion and support (BFPS), please provide below the source of these funds, the amount, and the method the State agency will use to document the use of these NE and BFPS funds. (Federal WIC food funds used to purchase/rent breast pumps, and expenditures from breastfeeding peer counseling funds, cannot be counted toward the nutrition education and breastfeeding expenditure requirement.)

☒ Does not apply. (Proceed to E. 4. Local agencies report nutrition education and breastfeeding promotion and support costs.)

**Source**

**Amount**

**Method(s):**

☐ Activity reports      ☐ Time studies      ☐ Itemizing expenditures

☐ Other (specify):

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

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**4. Local agencies report nutrition education and breastfeeding promotion and support costs:**

- ☐ Does not apply
- ☒ When they report routine NSA costs
- ☐ Through a different system (specify):

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

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### F. Indirect Costs

#### 1. Indirect Cost Rate and Services

**a. Please list below indirect cost/cost allocation agreements in which the State agency is included:**

Indirect Cost Negotiation between Wisconsin DHS and U.S. DHHS dated 1/4/2019

**b. The State agency's indirect cost rate(s) is 6.5 (%) and is based on:**

☒ Salaries      ☐ Direct costs for administration      ☐ Both

☐ Other (specify):

**c. Please cite the effective date of the State agency's current negotiated agreement and/or cost allocation plan for indirect costs: 1/4/2019**

**d. The State agency receives the following types of services under the indirect cost rate agreement(s):**

<input checked="" type="checkbox"/> Budgeting/accounting	<input type="checkbox"/> Personnel/payroll
<input checked="" type="checkbox"/> ADP	<input type="checkbox"/> Space usage/maintenance
<input type="checkbox"/> Communication/phone/mail	<input type="checkbox"/> Central supply
<input type="checkbox"/> Legal services	<input checked="" type="checkbox"/> Procurement/contracting
<input type="checkbox"/> Printing/publication	<input checked="" type="checkbox"/> Audit services
<input type="checkbox"/> Equipment usage/maintenance	<input checked="" type="checkbox"/> Other (specify): Administrative Management, AA/CRC

**e. The State agency allows local agencies to report indirect costs.**

☒ Yes      ☐ No      ☐ Not Applicable

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**

Appendix V.F.1. Indirect Cost Negotiation Agreement

#### 2. Review of Indirect Cost Documentation

**a. The State agency and local agencies ensure that services received and paid for through indirect costs benefit WIC and are not also charged directly to WIC by comparing direct charges by line item to a listing of services paid by funds collected through the application of the indirect cost rate:**

☒ Done for State agency level indirect costs (frequency): Annually during Single Audit

☒ Done for local agency level indirect costs (frequency): Annually during Single Audit

☐ Not done at either level.

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- b. State and local agency WIC management have access to and review the following documents as applicable to ensure that indirect cost services are not also charged directly to WIC (check all that apply):

	At SA	At LA
Indirect cost agreements/plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The accounting mechanism used to ensure the propriety of indirect cost charges	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A copy of the cost allocation plan	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
A list of all services paid from indirect costs	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other documentation related to the establishment and charging of indirect costs	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Not applicable	<input type="checkbox"/>	<input type="checkbox"/>

- c. When the State agency reviews the local agencies' indirect cost rate agreements, the review includes (check all that apply):

- ☒ Required submission of indirect cost agreement by the local agency to the State agency
- ☐ Assessment of how the rate or method is applied (correct time period, percentage, and base)
- ☐ Verification that the State agency had previously approved the local agency to negotiate such an agreement
- ☐ Post-review or audit to ensure the rate was applied correctly
- ☐ Other documentation related to the establishment and charging of indirect costs (list):
- ☐ Not applicable

**ADDITIONAL DETAIL: NSA Expenditures Appendix and/or Procedure Manual (citation):**